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**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

(Hon. Michael B. Kaplan)

BLOCKFI INC., et al.,¹

Chapter 11

Debtors.

Case No. 22-19361 (MBK)

(Jointly Administered)

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF NOTICES AND PAPERS**

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

PLEASE TAKE NOTICE that Gibbons, P.C. and Hogan Lovells US LLP hereby enter their appearance (the "**Notice of Appearance**") in the above-captioned cases as counsel to Ankura Trust Company, LLC, as indenture trustee (the "**Indenture Trustee**") under an Indenture (the "**Indenture**"), dated as of April 14, 2022, as supplemented, between BlockFi Inc. (the "**Company**") and the Indenture Trustee relating to the BlockFi Interest Accounts that are registered on the books and records of the Company as owned by Holders (as defined in the Indenture) residing in the United States, pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the "**Bankruptcy Code**"), and rules 2002, 3017(a), 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), and request that copies of any and all notices and papers filed or entered in these cases be given to and served upon the following:

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PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code and Bankruptcy Rule 3017(a), this request includes not only the notices and papers referred to in the Bankruptcy Rules, but also includes, without limitation, any notice, motion, proposed order, application, petition, pleading, request, complaint, demand, memorandum, affidavit, declaration, presentment, order to show cause, disclosure statement, and plan of reorganization, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile, electronic mail, or otherwise, that is filed or given in connection with the above-captioned cases and the proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any prior or later appearance, pleading, or claim waives (i) any right to have final orders in non-core matters entered only after *de novo* review by a district court judge; (ii) any right to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to the above-captioned cases; (iii) any right to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (iv) an election of remedies; or (v) any other substantive or procedural right.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance is without prejudice to any other rights, claims, actions, defenses, setoffs, or recoupments under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments against a debtor or any other entity either in the above-captioned cases or in any other action are expressly reserved.

Dated: January 4, 2023
Newark, New Jersey

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By: /s/ Robert K. Malone
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CERTIFICATION OF SERVICE PURSUANT TO 11 U.S.C. § 1746

Robert K Malone, of full age, under penalty of perjury, hereby certifies as follows:

1. I am an attorney-at-law of the State of New Jersey and a Director with Gibbons P.C., co-counsel for Ankura Trust Company, LLC, as Indenture Trustee, in the above captioned bankruptcy proceedings.

2. On January 4, 2023, I caused a true and correct copy of the attached Notice of Appearance to be served upon: (i) Cole Schotz P.C., Kirkland & Ellis LLP, and Haynes and Boone, LLP, proposed attorneys for the Debtors; and (ii) the Office of the United States Trustee, Region 3 via first class mail, postage pre-paid; and (iii) all parties having formally requested notice electronically via the Court's CM/ECF system.

I certify that the foregoing is true and correct.

Executed on: January 4, 2022

/s/ Robert K. Malone

Robert K. Malone